

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON DATA  
SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR  
COMMERCIAL PARTNERS, et al.,

Defendant.

CASE NO. 1:20-CV-484-RDA-TCB

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800 HOYT LLC,

Intervening Interpleader Plaintiff /  
Intervening Interpleader Counter-  
Defendant,

v.

BRIAN WATSON, WDC HOLDINGS, LLC,  
and BW HOLDINGS, LLC,

Interpleader Defendants

AMAZON.COM, INC. and AMAZON DATA  
SERVICES, INC.

Interpleader Defendants / Interpleader  
Counter-Plaintiffs.

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**DECLARATION OF SARA R. BODNER IN SUPPORT OF THE WATSON  
DEFENDANTS' MOTION FOR COURT-HOSTED SETTLEMENT CONFERENCE OR  
PRIVATE MEDIATION**

I, Sara R. Bodner, hereby declare as follows:

1. I am over the age of 18 years. I am an attorney licensed to practice law in the States of Colorado and New York. I have been admitted *pro hac vice* to appear before this Court in the present case on behalf of Brian Watson, WDC Holdings LLC d/b/a Northstar Commercial Partners, Sterling NCP FF, LLC, Manassas NCP FF, LLC, NSIPI Administrative Manager, and BW Holdings, LLC (collectively, the “Watson Defendants”). I am an associate attorney at the law firm of Brownstein Hyatt Farber Schreck LLP.

2. I make this declaration in support of the Watson Defendants’ Motion for Court-Hosted Settlement Conference or Private Mediation.

3. **Exhibit A** is a true and correct copy of an June 22, 2022 Memorandum Opinion in the case styled *WDC Holdings, LLC, et al. v. IPI Partners, LLC, et al.*, C.A. No. 2020-1026 (Del. Chancery).

4. **Exhibit B** is a true and correct copy of an article entitled, “Amazon Data Center Builder Advances Suit Against Venture Partner,” published by Bloomberg Law on June 23, 2022.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on June 27, 2022.

/s/ Sara R. Bodner

Sara R. Bodner